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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT SUBMISSION RE:
COURT ORDER FOR ADDITIONAL
INFORMATION, DKT. 401**

Referral: Hon. Susan van Keulen, USMJ

February 14, 2021

Submitted via ECF

Magistrate Judge Susan van Keulen
San Jose Courthouse
Courtroom 6 - 4th Floor
280 South 1st Street
San Jose, CA 95113

Re: Joint Submission re: Court Order for Additional Information, Dkt. 401
Brown v. Google LLC, Case No. 4:20-cv-03664-YGR-SVK (N.D. Cal.)

Dear Magistrate Judge van Keulen:

Pursuant to Your Honor's Order for Additional Information (Dkt. 401), Plaintiffs and Google LLC ("Google") jointly submit this status update. Counsel for the parties met and conferred and have resolved the dispute raised in Dkt. 398-1. In the interest of further compromise, Google has agreed to produce custodial documents for Bert Leung for the time period and search terms set out in this Court's order at Dkt. 401.

In addition, Google notes that although it began the process of importing Mr. Leung's custodial data into its review database promptly after receiving this Court's order, that process is still underway. Due to the time it takes for this process, Google has not yet been able to de-duplicate its search results. Google provides the following search results, which have not yet been de-duplicated.

Search Term	Documents	Documents w/Family	Unique Documents
Incognito	1510	1731	1138
ChromeGuard	515	600	156
"Chrome Guard"	123	204	17

Respectfully,

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Joint Submission.
Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has
concurred in the filing of this document.

Dated: February 14, 2022

By Andrew H. Schapiro
Andrew H. Schapiro
Counsel on behalf of Google